

EXHIBIT 2

From: [Vaughan, Aria \(CRT\)](#)
To: ["Louis Fisher"; John Hooks](#)
Cc: [John Compton; Natasha Merle; Kristen A. Johnson; John Cusick; Singleton, Natane \(CRT\)](#)
Subject: RE: Barnhardt v. Meridian: forthcoming motions
Date: Friday, November 16, 2018 4:19:00 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.jpg](#)

John,

The United States agrees that Chief Clayton did not substantively answer questions about Meridian Public School District Police Department's training and policies and procedures, including the District's response to plaintiffs' proposed revisions to those policies and procedures and the District's adopted definition of force under those policies. We will not oppose private plaintiffs' motion.

Given the outstanding discovery requests, including the District's response to our own request, we agree that the parties should ask the Court to push the discovery deadline back until all documents are received and depositions have closed, as well as provide two weeks following that date to notify the District as to our specific objections to unitary status. The information we have requested following Chief Clayton's 30(b)(6) deposition is information that should have been reported to us pursuant to paragraph 109 of the 2013 Consent Order and was separately requested at various points throughout our monitoring of the District's compliance of that order, including on November 9, 2017, following our in-person meeting to discuss the District's progress towards achieving unitary status. It is imperative that we are given an opportunity to engage in a meaningful review of all information so we can make a fully informed decision.

Best,
Aria

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